

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

Houston Area Urban League, *et al.*,

*Plaintiffs,*

v.

Gregory Abbott, *et al.*,

*Defendants.*

No. 5:21-cv-00848-XR

Consolidated with *La Unión del Pueblo  
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S  
[PROPOSED] ANSWER TO SECOND AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Second Amended Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote. Statements of President Ronald Reagan speak for themselves and do not require a response. To the extent a response is required, the Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1.
2. Court decisions speak for themselves and do not require a response.
3. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1

was motivated by racial discrimination. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 4 and so deny them.
5. The Republican Committees deny that Texas election laws are exclusionary. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5 and so deny them.
6. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 6 and so deny them.
7. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 7 and so deny them.
8. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 8 and so deny them.
9. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the allegations in Paragraph 9 and so deny them.

10. The Republican Committees deny that Texas “attempt[ed] to re-erect barriers to voting” or that the referenced actions were taken for racially discriminatory reasons. The referenced executive order, statements made in media articles, and court decisions speak for themselves and do not require a response. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.
11. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 and so deny them.
12. Statements made in media articles and the referenced report speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 and so deny them.
13. Voter turnout data and statements made in media articles and the referenced report speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13 and so deny them.
14. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are

without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 and so deny them.

15. The Republican Committees deny that Texas election laws impose “substantial barriers” to voting. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 15 and so deny them.
16. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.
17. The Republican Committees deny the allegations that Plaintiffs’ characterizations of SB 1 or its effects are accurate. The statute, voter turnout data, and statements made in media articles speak for themselves and do not require a response. Paragraph 17 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 and so deny them.
18. The Republican Committees deny that SB 1 imposes “heavy burdens on voters” or “prohibits counties from making voting accessible and safe.” Paragraph 18 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 18 and so deny them.
19. The Republican Committees deny that SB 1 was motivated by racial discrimination and that SB 1 makes it “harder for voters of color to vote.” Paragraph 19 states legal conclusions that

do not require a response. To the extent a response is required, these allegations are denied.

The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 19 and so deny them.

20. The Republican Committees deny that SB 1 was motivated by racial discrimination. Paragraph 20 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 20 and so deny them.

21. The Republican Committees deny that SB 1 “unduly burden[s] voters.” Paragraph 21 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 21 and so deny them.

22. Paragraph 22 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 22 and so deny them.

23. The Republican Committees deny that the risk of fraud in Texas elections “simply does not exist.” According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). The statements of public officials speak for themselves and do not require a response. Paragraph 23 states legal conclusions that do not require a

response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23 and so deny them.

24. The Republican Committees deny that SB 1 was motivated by racial discrimination. Paragraph 24 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 24 and so deny them.

25. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021. The statute and its legislative history speak for themselves and do not require a response. Paragraph 25 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

26. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The statutes speak for themselves and do not require a response. To the extent a response is required, the Republican Committees otherwise deny the allegations in Paragraph 26, deny that Plaintiffs' claims have merit, and deny that Plaintiffs are entitled to relief.

27. The Republican Committees deny that SB 1 discriminates on the basis of race and that SB 1 "will harm all Texas voters." Paragraph 27 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

28. The Republican Committees deny that Plaintiffs are entitled to relief.

## **JURISDICTION AND VENUE**

29. Paragraph 29 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
30. Paragraph 30 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
31. Paragraph 31 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
32. Paragraph 32 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
33. Paragraph 33 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 33.

## **PARTIES**

34. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 34 and so deny them.
35. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 and so deny them.
36. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 36 and so deny them.

37. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 37 and so deny them.

38. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 38 and so deny them.

39. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 and so deny them.

40. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40 and so deny them.

41. The Republican Committees deny that Plaintiffs' characterization of SB 1 and its alleged effects is accurate. Paragraph 41 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 41 and so deny them.

42. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without



knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 42 and so deny them.

43. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them.

44. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 and so deny them.

45. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 and so deny them.

46. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46 and so deny them.

47. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47 and so deny them.

48. The Republican Committees deny that SB 1 burdens or denies the right to vote. The Republican Committees deny that Plaintiffs' characterization of SB 1 and its alleged effects is accurate. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 48 and so deny them.

49. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Court decisions speak for themselves and do not require a response. Footnote 22 to Paragraph 49 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a

response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 49 and so deny them.

50. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and so deny them.

51. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 and so deny them.

52. The Republican Committees deny that SB 1 harms the disability community or suppresses the right to vote. Legislative history speaks for itself and does not require a response. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 52 and so deny them.

53. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53 and so deny them.

54. Legislative history speaks for itself and does not require a response. Paragraph 54 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 and so deny them.

55. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 55 and so deny them.

56. The Republican Committees deny the allegations in Paragraph 56.
57. The Republican Committees deny that SB 1 has a “suppressive effect.” Paragraph 57 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 57 and so deny them.
58. Legislative history speaks for itself and does not require a response. Paragraph 58 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 58 and so deny them.
59. Paragraph 59 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 59 and so deny them.
60. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 60 and so deny them.
61. Paragraph 61 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 61 and so deny them.

62. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 62 and so deny them.

63. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63 and so deny them.

64. Paragraph 64 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 64 and so deny them.

65. Paragraph 65 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 65 and so deny them.

66. The Republican Committees deny that SB 1 has negative effects. Paragraph 66 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 66 and so deny them.

67. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Paragraph 67 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 67 and so deny them.

68. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Paragraph 68 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 68 and so deny them.

69. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Paragraph 69 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 69 and so deny them.

70. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 imposes criminal penalties for fulfilling the responsibilities of an election judge. Legislative

history speaks for itself and does not require a response. Paragraph 70 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 70 and so deny them.

71. The Republican Committees admit that Defendant Abbott is the Governor of Texas and that Plaintiffs purport to sue him in his official capacity.
72. The Republican Committees admit that Defendant Scott is the Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 72 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
73. The statutes speak for themselves and require no response. Paragraph 73 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
74. The statutes speak for themselves and require no response. Paragraph 74 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 74 and so deny them.
75. The statutes speak for themselves and require no response. Paragraph 75 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

76. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.
77. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Ogg is the Harris County District Attorney and that Plaintiffs purport to sue her in her official capacity. Paragraph 77 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
78. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Gonzales is the Bexar County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 78 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
79. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Garza is the Travis County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 79 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
80. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas. Paragraph 80 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

81. The statutes speak for themselves and do not require a response. Paragraph 81 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

82. The statutes speak for themselves and do not require a response. Paragraph 82 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

83. The statements of public officials speak for themselves and do not require a response. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 83 and so deny them.

84. The Republican Committees admit that Defendant Callanen is the Bexar County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. Paragraph 84 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

85. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 85 and so deny them.



## **GENERAL ALLEGATIONS**

86. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.
87. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 and so deny them.
88. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 88 and so deny them.
89. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the allegations in Paragraph 89 and so deny them.

90. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91 and so deny them.

92. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94 and so deny them.

95. The Republican Committees admit that the Democratic Party adopted a rule limiting primary participation to white citizens and that the United States Supreme Court held that practice unconstitutional. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 95 and so deny them.

96. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96 and so deny them.
97. Court decisions and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97 and so deny them.
98. Legislative history speaks for itself and does not require a response. Paragraph 98 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 98 and so deny them.
99. Legislative history and court cases speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 99 and so deny them.
100. Statements by government agencies, legislative history, and court decisions speak for themselves and do not require a response. Paragraph 100 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 100 and so deny them.

101. Court decisions and legislative history speak for themselves and do not require a response. Paragraph 101 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101 and so deny them.
102. Court decisions speak for themselves and do not require a response. Paragraph 102 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102 and so deny them.
103. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and so deny them.
104. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104 and so deny them.
105. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and so deny them.
106. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106 and so deny them.

107. Government reports speak for themselves and do not require a response. Paragraph 107 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 107 and so deny them.
108. Court decisions, voter turnout data, and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 108 and so deny them.
109. The referenced letter speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 109 and so deny them.
110. The statements of public officials, statements made in media articles, and court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 110 and so deny them.
111. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 111 and so deny them.

112. The Republican Committees deny that SB 1 “imped[es], burden[s], [or] discriminat[es] against voters of color.” The Republican Committees deny the remaining allegations in paragraph 112.

113. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113 and so deny them.

114. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions and the referenced reports speak for themselves and do not require a response. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 114 and so deny them.

115. Court decisions and the referenced reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 115 and so deny them.

116. Court decisions, statements made in media articles, and the referenced reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 116 and so deny them.
117. The Republican Committees deny that Black and Latino Texans lack equal “ability to participate in the political process” and that SB 1 makes it harder for anyone to participate in the political process. Court decisions and the referenced report speak for themselves and do not require a response. Paragraph 117 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 117 and so deny them.
118. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and so deny them.
119. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 119 and so deny them.
120. The Republican Committees deny that SB 1 “seeks to curb voter participation” in any Texas county. Paragraph 120 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 120 and so deny them.

121. The Republican Committees deny that Texas election law imposes barriers on the right to vote. The referenced sources and voter turnout data speak for themselves and do not require a response. Paragraph 121 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 121 and so deny them.

122. The Republican Committees deny that SB 1 discriminates against anyone or denies anyone “equal access to the electoral process.” The referenced sources speak for themselves and do not require a response. Paragraph 122 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 122 and so deny them.

123. The referenced study and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 123 and so deny them.

124. Paragraph 124 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information



sufficient to form a belief about the truth of the remaining allegations in Paragraph 124 and so deny them.

125. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 125 and so deny them.

126. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 126 and so deny them.

127. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 127 and so deny them.

128. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128 and so deny them.

129. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 129 and so deny them.

130. The statutes speak for themselves and do not require a response. Paragraph 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 130 and so deny them.

131. Paragraph 131 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 131 and so deny them.
132. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 132 and so deny them.
133. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 133 and so deny them.
134. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 134 and so deny them.
135. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 135 and so deny them.
136. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136 and so deny them.
137. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 137 and so deny them.
138. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 138 and so deny them.
139. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 139 and so deny them.

140. Paragraph 140 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 140 and so deny them.
141. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 141 and so deny them.
142. Paragraph 142 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 142 and so deny them.
143. The Republican Committees deny the allegations in Paragraph 143.
144. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 144 and so deny them.
145. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 145 and so deny them.

146. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 146 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 146 and so deny them.

147. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 147 and so deny them.

148. The legislation speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 148 and so deny them.

149. The referenced testimony speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149 and so deny them.

150. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The testimony speaks for itself and does not require a response. To the

extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150 and so deny them.

151. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 151 and so deny them.

152. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 152 and so deny them.

153. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 153 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 153 and so deny them.

154. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 154 states legal conclusions and/or statements of what the law

provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 155 and so deny them.

156. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 156 and so deny them.

157. Legislative history and the statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. Legislative history and the statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 158 and so deny them.

159. Legislative history, the statements of public officials, and Census Bureau data speak for themselves and do not require a response. To the extent a response is required, the Republican

Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 159 and so deny them.

160. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 160 and so deny them.

161. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 161 and so deny them.

162. The Republican Committees deny that SB 7 would have had a discriminatory impact on voting. Legislative history and the statements of public officials speak for themselves and do not require a response. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 162 and so deny them.

163. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 163 and so deny them.

164. The Republican Committees deny that SB 7 would have had a disproportionate impact on large, urban counties or voters of color. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 165 and so deny them.
166. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 166 and so deny them.
167. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 167 and so deny them.
168. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 168 and so deny them.
169. The Republican Committees deny that the intent of SB 1 is to “suppress voters” or that the legislation has “discriminatory intent” or “ties to white supremacy.” Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or



information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 170 and so deny them.

171. Legislative history and the referenced sources speak for themselves and do not require a response. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 171 and so deny them.

172. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 172 and so deny them.

173. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 173 and so deny them.

174. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 174 and so deny them.

175. The referenced sources speak for themselves and do not require a response. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175 and so deny them.
176. Legislative history speaks for itself and does not require a response. Paragraph 176 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 176 and so deny them.
177. Legislative history speaks for itself and does not require a response. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 177 and so deny them.
178. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 178 and so deny them.
179. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 179 and so deny them.

180. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 180 and so deny them.

181. Statements made in media articles and the referenced proclamation speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 181 and so deny them.

182. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 182 and so deny them.

183. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 183 and so deny them.

184. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 184 and so deny them.

185. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 185 and so deny them.
186. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 186 and so deny them.
187. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history, the statements of public officials, and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.
188. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 188 and so deny them.

189. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 189 and so deny them.
190. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 190 and so deny them.
191. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 191 and so deny them.
192. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 192 and so deny them.
193. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 193 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 193 and so deny them.

194. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 194 and so deny them.
195. The Republican Committees deny that SB 1 “targets” any particular method of voting. The Republican Committees deny that Plaintiffs’ characterization of SB 1 and its alleged effects is accurate. Paragraph 195 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 195 and so deny them.
196. The statutes speak for themselves and do not require a response. Paragraph 196 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 196 and so deny them.
197. The statute speaks for itself and does not require a response. Paragraph 197 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 197 and so deny them.

198. The referenced sources speak for themselves and do not require a response. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 198 and so deny them.

199. The statute speaks for itself and does not require a response. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

200. The statutes speak for themselves and do not require a response. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

201. The statutes speak for themselves and do not require a response. Paragraph 201 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

202. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 202 and so deny them.

203. Court decisions speak for themselves and do not require a response. Paragraph 203 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 203 and so deny them.

204. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 204 and so deny them.

205. The Republican Committees deny that SB 1 “discourages [or] dissuades” voters of color from voting or “increas[es] the costs of voting.” The statute speaks for itself and does not require a response. Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 205 and so deny them.

206. The Republican Committees deny that SB 1 makes it more difficult for voters of color and voters with disabilities to cast a ballot in person. The statute speaks for itself and does not require a response. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 206 and so deny them.

207. The Republican Committees deny that SB 1 burdens Black and Latino voters. The statute speaks for itself and does not require a response. Paragraph 207 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To



the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 207 and so deny them.

208. Voter turnout and demographic data speak for themselves and do not require a response.

To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 208 and so deny them.

209. The Republican Committees deny that SB 1 “target[s]” any particular method and means of voting. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 209 and so deny them.

210. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 210 and so deny them.

211. The referenced analysis speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 211 and so deny them.

212. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials speak for themselves and do not require a response. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 and so deny them.

213. The Republican Committees deny the allegations in Paragraph 213.

214. The Republican Committees deny that SB 1 “curtail[s] voters’ ability to obtain information” or “increas[es]” burdens on voters.” The statute and legislative history do not require a response. Paragraph 214 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 214 and so deny them.

215. The Republican Committees deny that SB 1 makes it more difficult for voters of color and voters with disabilities to cast a ballot in person. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 215 and so deny them.

216. The statutes speak for themselves and do not require a response. Paragraph 216 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
217. The Republican Committees deny that SB 1 denies people with disabilities equal access to the early voting application process. The statutes speak for themselves and do not require a response. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 217 and so deny them.
218. The statutes speak for themselves and do not require a response. Paragraph 218 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
219. The statutes speak for themselves and do not require a response. Paragraph 219 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
220. The statute speaks for itself and does not require a response. Paragraph 220 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 220 and so deny them.
221. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute speaks for itself and does not require a response. Paragraph 221 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

222. The Republican Committees deny that SB 1 “burden[s]” voters. The statute speaks for itself and does not require a response. Paragraph 222 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

223. The statutes speak for themselves and do not require a response. Paragraph 223 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

224. The statutes speak for themselves and do not require a response. Paragraph 224 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

225. The Republican Committees deny that SB 1 “impedes early-mail-in voting” or “burdens voters.” The statutes speak for themselves and do not require a response. Paragraph 225 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 225 and so deny them.

226. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 226 and so deny them.

227. The Republican Committees deny that SB 1 “will increase voter and election official intimidation.” The statutes speak for themselves and do not require a response. Paragraph 227 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 227 and so deny them.

228. The Republican Committees deny that SB 1 undermines protections for voters. The statutes speak for themselves and do not require a response. Paragraph 228 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 228 and so deny them.

229. The statute speaks for itself and does not require a response. Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

230. The statutes speak for themselves and do not require a response. Paragraph 230 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 230 and so deny them.

231. The statutes speak for themselves and do not require a response. Paragraph 231 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 231 and so deny them.
232. The Republican Committees deny the allegations in Paragraph 232.
233. The Republican Committees deny the allegations in Paragraph 233.
234. The statutes speak for themselves and do not require a response. Paragraph 234 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
235. The Republican Committees deny that SB 1 imposes barriers on voters with disabilities, prevents eligible individuals from providing assistance, or denies anyone equal access to voting. The statutes speak for themselves and do not require a response. Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 235 and so deny them.
236. The Republican Committees deny that SB 1 denies voters with disabilities equal access to voting. The statutes speak for themselves and do not require a response. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 236 and so deny them.

237. The Republican Committees deny that SB 1 poses an “undue burden” on any individual who needs assistance voting. The statutes speak for themselves and do not require a response. Paragraph 237 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 237 and so deny them.
238. The statutes speak for themselves and do not require a response. Paragraph 238 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
239. The statutes speak for themselves and do not require a response. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 239 and so deny them.
240. The statutes speak for themselves and do not require a response. Paragraph 240 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 240 and so deny them.
241. The statutes speak for themselves and do not require a response. Paragraph 241 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

242. The statutes speak for themselves and do not require a response. Paragraph 242 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
243. The Republican Committees deny that SB 1 is unconstitutional or “burden[s] the right of voters to vote during emergencies.” The statute speaks for itself and does not require a response. Paragraph 243 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 243 and so deny them.
244. The statutes speak for themselves and do not require a response. Paragraph 244 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
245. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials speak for themselves and do not require a response. Paragraph 245 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 245 and so deny them.



246. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 246 and so deny them.

247. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 247 and so deny them.

248. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Census bureau data and government reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without

knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 248 and so deny them.

249. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 249 and so deny them.

250. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute speaks for itself and does not require a response. Paragraph 250 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 250 and so deny them.

251. The Republican Committees admit that “the Texas Legislature need not wait for prevalent election fraud before drafting prophylactic laws.” The Republican Committees deny that SB 1 is unlawful or that Plaintiffs are entitled to relief. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute speaks for itself and does not require a response. Paragraph 251 states legal conclusions and/or statements of what the

law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 251 and so deny them.

## **CLAIMS FOR RELIEF**

### **Count One**

250. The Republican Committees incorporate their responses to the preceding paragraphs.
251. The Republican Committees deny that SB 1 will “place an undue burden” on voting. The First and Fourteenth Amendments and the statute speak for themselves and do not require a response. Paragraph 251 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
252. The Fourteenth Amendment speaks for itself and does not require a response.
253. The First Amendment speaks for itself and does not require a response. Paragraph 253 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
254. Court decisions speak for themselves and do not require a response.
255. Court decisions speak for themselves and do not require a response.
256. Court decisions speak for themselves and do not require a response. Paragraph 256 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

257. Court decisions speak for themselves and do not require a response. Paragraph 257 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
258. Court decisions speak for themselves and do not require a response. Paragraph 258 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
259. The Republican Committees deny that SB 1 will “erect substantial burdens and barriers on Texas voters.” Paragraph 259 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
260. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
261. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
262. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
263. The Republican Committees deny that SB 1 “will make voting harder” or “unnecessarily burden access to absentee ballots” for eligible voters. Paragraph 263 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees

are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 263 and so deny them.

264. The Republican Committees deny the justification for SB 1 was “pretextual.” Court decisions speak for themselves and do not require a response. Paragraph 264 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 264 and so deny them.

265. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 265 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 265 and so deny them.

266. Paragraph 266 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 266 and so deny them.

267. Paragraph 267 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

268. Paragraph 268 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 268 and so deny them.

269. Paragraph 269 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 269 and so deny them.

### **Count Two**

270. The Republican Committees incorporate their responses to the preceding paragraphs.

271. Section 1983 speaks for itself and does not require a response. Paragraph 271 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

272. The Fourteenth Amendment speaks for itself and does not require a response.

273. Court decisions speak for themselves and do not require a response. Paragraph 273 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

274. Court decisions speak for themselves and do not require a response. Paragraph 274 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
275. The Republican Committees deny that SB 1 will “deny, abridge, or suppress the right to vote . . . on account of race or color.” Paragraph 275 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
276. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
277. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
278. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
279. The Republican Committees deny the allegations in Paragraph 279.
280. Paragraph 280 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 280 and so deny them.

281. Paragraph 281 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 281 and so deny them.

282. Paragraph 282 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 282 and so deny them.

283. Paragraph 283 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 283 and so deny them.

284. The Republican Committees deny the justification for SB 1 was “pretextual.” Paragraph 284 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

285. Legislative history speaks for itself and does not require a response. The allegations in Paragraph 285 are legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these



allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 285 and so deny them.

286. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 286 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 286 and so deny them.

287. The Republican Committees deny that SB 1 “abridge[es]” anyone’s right to vote. Paragraph 287 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 287 and so deny them.

288. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 288 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 288 and so deny them.

289. Paragraph 289 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 289 and so deny them.

### **Count Three**

290. The Republican Committees incorporate their responses to the preceding paragraphs.

291. The Fifteenth Amendment speaks for itself and does not require a response. Paragraph 291 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

292. The Fifteenth Amendment speaks for itself and does not require a response.

293. The Fifteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 293 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

294. The Republican Committees deny that SB 1 “violate[s] the Fifteenth Amendment.” Paragraph 294 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

295. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
296. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
297. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
298. The Republican Committees deny that SB 1 was enacted “to intentionally deny, abridge, or suppress the right to vote.” Paragraph 298 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 298 and so deny them.
299. Paragraph 299 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 299 and so deny them.
300. Paragraph 300 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 300 and so deny them.

#### **Count Four**

301. The Republican Committees incorporate their responses to the preceding paragraphs.
302. Section 2 of the Voting Rights Act speaks for itself and does not require a response.
303. Court decisions speak for themselves and do not require a response. Paragraph 303 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
304. Court decisions speak for themselves and do not require a response. Paragraph 304 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
305. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 305 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 305 and so deny them.
306. Court decisions speak for themselves and do not require a response. Paragraph 306 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 306 and so deny them.

307. Paragraph 307 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 307 and so deny them.

308. Paragraph 308 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 308 and so deny them.

309. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

310. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

311. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

312. Paragraph 312 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 312 and so deny them.

313. The Republican Committees deny that SB 1 “specifically target[s] voting methods that Latino, Black and other voters of color” use or have used. Paragraph 313 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 313 and so deny them.

314. Paragraph 314 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 314 and so deny them.

315. The Republican Committees deny that SB 1 was “pretextual.” The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Court decisions speak for themselves and do not require a response. Paragraph 315 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 315 and so deny them.

316. The Republican Committees deny that SB 1 denies or abridges the right to vote. Paragraph 316 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

317. Paragraph 317 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 317 and so deny them.

#### **Count Five**

318. The Republican Committees incorporate their responses to the preceding paragraphs.

319. The Voting Rights Act speaks for itself and does not require a response. Paragraph 319 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

320. The Voting Rights Act speaks for itself and does not require a response. Paragraph 320 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

321. The Voting Rights Act and court decisions speak for themselves and do not require a response. Paragraph 321 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

322. The statutes speak for themselves and do not require a response. Paragraph 322 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
323. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
324. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
325. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote. The statutes speak for themselves and do not require a response. Paragraph 325 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
326. Paragraph 326 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 326 and so deny them.

### **Count Six**

327. The Republican Committees incorporate their responses to the preceding paragraphs.
328. The Fourteenth Amendment to the U.S. Constitution and court decisions speak for themselves and do not require a response. Paragraph 328 states legal conclusions and/or



statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

329. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote or is “unconstitutionally vague.”

330. The statutes speak for themselves and do not require a response. Paragraph 330 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

331. The statutes speak for themselves and do not require a response. Paragraph 331 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

332. The statutes speak for themselves and do not require a response. Paragraph 332 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

333. The statutes speak for themselves and do not require a response. Paragraph 333 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. Court decisions speak for themselves and do not require a response.

334. Paragraph 334 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 334 and so deny them.

335. Paragraph 335 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 335 and so deny them.

336. Court decisions speak for themselves and do not require a response. Paragraph 336 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 336 and so deny them.

### **Count Seven**

337. The Republican Committees incorporate their responses to the preceding paragraphs.

338. The Republican Committees admit that “[v]oting is a fundamental right.” The government report speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 338 and so deny them.

339. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully “discriminate[s] against voters with disabilities.”

340. The Americans with Disabilities Act (ADA) and court decisions speak for themselves and do not require a response. Paragraph 340 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

341. The ADA and court decisions speak for themselves and do not require a response.

Paragraph 341 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

342. The ADA and regulations speak for themselves and do not require a response. Paragraph

342 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

343. The ADA speaks for itself and does not require a response. Paragraph 343 states legal

conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

344. Paragraph 344 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 344 and so deny them.

345. Paragraph 345 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied.

346. The ADA and regulations speak for themselves and do not require a response. Paragraph

346 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

347. The ADA speaks for itself and does not require a response. Paragraph 347 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
348. The ADA speaks for itself and does not require a response. Paragraph 348 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
349. The Republican Committees deny that SB 1 “discriminate[s] against people with disabilities in exercising their right to vote.” The statutes speak for themselves and do not require a response. Paragraph 349 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
350. Paragraph 350 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 350 and so deny them.
351. The Republican Committees deny the allegations in Paragraph 351.
352. The Republican Committees deny that SB 1 “discriminate[s] against qualified Texas voters with disabilities.” The statutes speak for themselves and do not require a response. Paragraph 352 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

353. Paragraph 353 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 353 and so deny them.

### **Count Eight**

354. The Republican Committees incorporate their responses to the preceding paragraphs.

355. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully “discriminate[s] against voters with disabilities.”

356. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 356 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

357. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 357 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

358. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 358 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

359. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 359 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

360. The Rehabilitation Act and ADA speak for themselves and do not require a response.

Paragraph 360 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

361. Paragraph 361 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 361 and so deny them.

362. The Rehabilitation Act, the ADA, and court decisions speak for themselves and do not require a response. Paragraph 362 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

363. The Republican Committees incorporate their responses to the preceding paragraphs responding to Count Seven. The Republican Committees deny that SB 1 “discriminate[s] against people with disabilities in exercising their right to vote” or violates the Rehabilitation Act. Paragraph 363 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 363 and so deny them.

364. The Republican Committees deny that SB 1 “den[ies] qualified individuals with disabilities a full and equal opportunity to participate in the State’s voting programs.” The statutes speak

for themselves and do not require a response. Paragraph 364 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

365. Paragraph 365 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 365 and so deny them.

#### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

#### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

##### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

##### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

##### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

##### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

### **CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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*\*Pro hac vice applications forthcoming*

*\*\*Application for admission to the Western*

*District of Texas pending*

*Admitted in Pennsylvania*

*Not admitted in D.C. (directly supervised by  
John M. Gore, a licensed D.C. Bar member)*